

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

"AURORA",

Plaintiff,

v.

PATRICK ALLEN SHEELY,

Defendant.

CASE NO. 16-cv-1358-RSM

AFFIDAVIT OF RANDALL L. GREEN,  
PHD

I, Randall L. Green, PhD., being first duly sworn, do hereby depose and say:  
hereby declares the following to be true and correct under penalty of perjury of the  
laws of the State of Washington:

1. I am a psychologist, licensed by the State of Oregon. A true and correct  
copy of my Curriculum Vita is attached hereto at Exhibit 1. A substantial part of my  
practice includes forensic psychological evaluation and testimony.

1           2.     I was contacted by attorney Carol Hepburn to provide a forensic  
2     psychological evaluation and make treatment recommendations for the young woman  
3     who is the subject of the "LJ" series of child pornography images. I met with "Aurora" in  
4     her home, conducted collateral interviews, reviewed medical, counseling and school  
5     records, as well as records of the criminal prosecution of her original perpetrator. My  
6     psychological evaluation was completed in August 19, 2014. A Copy of my report,  
7     redacted to protect her identity, is attached at Exhibit 2.

8  
9           3.     I have found throughout my work with "Aurora" that she has been a  
10    reliable and consistent historian, not given to exaggeration or hyperbole. She is  
11    focused on moving forward with her life. While she carries a heavy burden of  
12    unresolvable stress due to the presence of her images of her abuse on the internet  
13    and the consumption of these images by Mr. Sheely and others, she is doing her best  
14    to make a normal life for herself. She is an intelligent and sensitive individual who  
15    finds significance in the fact of distribution of her images on the internet as they relate  
16    to her personal safety and the continuing problem of child pornography consumption  
17    as a whole. She has suffered separate, identifiable personal injury as a result of each  
18    crime against her.

19  
20  
21           I am over the age of 18 years and am competent to testify to all matters  
22    set forth herein, which statements are also based upon my personal knowledge.

23           DATED this 29<sup>th</sup> day of Dec, 2016.

24           

25           \_\_\_\_\_  
Randall L. Green, Ph.D.

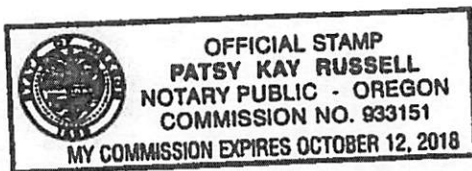
1 STATE OF Oregon:

2 : ss:

3 COUNTY OF MARION:

4 I certify that I know or have satisfactory evidence that Randall L. Green Ph.D.  
5 signed this instrument, on oath, and acknowledged it as his/her free and voluntary act  
6 of such party for the uses and purposes mentioned in the instrument.

7 Dated this 29<sup>th</sup> day of Dec., 2016.



Patsy Kay Russell / Patsy Kay Russe II

Type/printed name:

Notary Public in and for the State of  
OREGON

My commission expires: 10-12-18

CERTIFICATE OF SERVICE

I, Carol L. Hepburn, being first duly sworn on oath, depose and state:

That at all times mentioned herein I was over 18 years of age; that I caused to be served via electronic mail and U.S. Mail, postage prepaid, a true and correct copy of the foregoing document, to the parties as follows:

Alexei C. Garick, WSBA No. 50962  
David S. Marshall, WSBA No. 11716  
THE MARSHALL DEFENSE FIRM  
1001 Fourth Avenue, 44<sup>th</sup> Floor  
Seattle, WA 98165  
206-826-1400  
206-826-1462 fax  
[alexei@marshalldefense.com](mailto:alexei@marshalldefense.com)  
Attorneys for Defendant Sheely

DATED this 29th day of December, 2016.

CAROL L. HEPBURN, P.S.

By: /s Carol L. Hepburn

By: /s J. William Savage

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J. William Savage, WSBA No. 32148  
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